

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
Jackson Division

MISSISSIPPI ASSOCIATION OF)
EDUCATORS, BARBARA PHILLIPS,)
JAMES THOMAS, DAWN ZIMMERER,) Civil No. _____
L.E. JIBOL, UNITED CAMPUS WORKERS)
SOUTHEAST LOCAL 3821, MADISYN)
DONLEY, ALEXIS COBBS, KAREN)
ADERER, FOSTERING LGBTQ+)
ADVOCACY, RESOURCES,)
ENVIRONMENTS AND WOMEN IN)
SCIENCE AND ENGINEERING,)
)

Plaintiffs,

v.

BOARD OF TRUSTEES OF STATE
INSTITUTIONS OF HIGHER LEARNING,
MISSISSIPPI COMMUNITY COLLEGE
BOARD, MISSISSIPPI STATE BOARD OF
EDUCATION, MISSISSIPPI CHARTER
SCHOOL AUTHORIZER BOARD,

Defendants.

DECLARATION OF CLIFFORD BOLER

Pursuant to 28 U.S.C. § 1746, I, Clifford Boler, make the following declaration under penalty of perjury:

1. My name is Clifford Boler. My place of residence is Hattiesburg, Mississippi. I have been a resident of Forrest County and the state of Mississippi for almost three years.
2. I am a former graduate student affiliated with the University of Southern Mississippi (“USM”). I received my bachelor’s degree from the University of Southern Mississippi in library and information sciences in Fall 2024. I began my graduate studies in the field of library and information sciences at the USM in January 2025. However, I left my graduate program at USM because of HB 1193.

3. Many of the concepts banned by HB 1193 are essential to the field of library sciences. These concepts are integral to the job of a librarian and the library sciences code of ethics. Our code is a codified set of expectations that the public should be able to expect from the public library. It is a service that should be unbiased and equal to all.
4. I want to continue learning as a student as I did before, but I cannot do so because HB 1193 is directly in conflict with Numbers 1, 2, 3, and 9 of the American Library Association Code of Ethics (“Code of Ethics”).
 - a. “We provide the highest level of service to all library users through appropriate and usefully organized resources; equitable service policies, equitable access; and accurate, unbiased, and courteous responses to all requests.”
 - b. “We uphold the principles of intellectual freedoms and resists all efforts to censor library resources.”
 - c. “We protect each library user’s right to privacy and confidentiality with respect to the information sought or received and resources consulting, borrowed, acquired, or transmitted.”
 - d. “We affirm the inherent dignity and rights of every person. We work to recognize and dismantle systemic and individual biases; o confront inequity and oppression; to enhance diversity and inclusion; and to advance racial and social justice in our libraries, communities, profession and associations, through awareness, collaboration, services, advocacy, and allocation of resources and spaces.”
5. Because of this conflict, I had to unenroll from USM’s graduate program and intend to apply to the University of Oklahoma library and information sciences program. It is impossible to separate DEI from the Code of Ethics. This is what I have been taught for the last three to four years of attending USM. The only important measurement for any library science

program is that it be accredited with the American Library Association. I am almost certain that USM's implementation of HB 1193 would imperil this accreditation.

6. My academic work is impacted by the following sections of HB 1193: 3(b), 3(i) and 3(f). Under each section, I believe my professors would be required to stop teaching classes and censor others.
7. For example, a class entitled "Programming for Underserved Populations" is currently taught within the library and information sciences program at the undergraduate and graduate level. This class would normally focus on how librarians should serve or work with differing communities, like the black, queer, immigrant, or disabled. The law does or likely may prohibit this class.
8. Certain provisions of the law are so broad and vague that it is unclear whether a librarian is permitted to catalog or collect books in the way that is necessary for the public to find them. It is also unclear whether permitting individuals to check out certain books discussing topics identified in the divisive concepts is "endorsing" or "assenting to" the divisive concepts. What do words like "superior" mean?
9. Ultimately in an effort not to violate HB 1193 and because HB 1193 would seriously undermine my library sciences education, I left my graduate program at USM.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed: June 16, 2025



Clifford Boler